

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

patrick.turner@bellsouth.com

January 23, 2007

The Honorable Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: dPi Teleconnect, LLC, Complainant/Petitioner v. BellSouth Telecommunications,  
Incorporated, Defendant/Respondent  
Docket No.: 2005-358-C

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2007 JAN 23 PM 3:36  
SC PUBLIC SERVICE  
COMMISSION

Dear Mr. Terreni:

Enclosed for filing are an original and one (1) copy of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Adnrew D. Shore in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this motion as indicated on the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosure  
cc: All Parties of Record  
DM #663868

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY  
SUBMITTED TO THE COMMISISON IN ACCORDANCE WITH ITS ELECTRONIC  
FILING INSTRUCTIONS.**

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re:

dPi Teleconnect, LLC,

Complainant/Petitioner

v.

BellSouth Telecommunications, Inc.

Defendant/Respondent

Docket No. 2005-358-C

FILED  
2007 JAN 23 11:12:36  
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COMMISSION

**MOTION FOR ADMISSION PRO HAC VICE**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit Andrew D. Shore, to practice pro hac vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Shore, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$250 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 23<sup>rd</sup> day of January 2007.

BELLSOUTH TELECOMMUNICATIONS, INC.



PATRICK W. TURNER  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

# **EXHIBIT A**



**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

January 23, 2007

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**S.C. SUPREME COURT**

Ms. Gail Watts  
Deputy Clerk for Admissions  
South Carolina Supreme Court of Bar Admissions  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: dPi Teleconnect, LLC, Complainant/Petitioner v. BellSouth  
Telecommunications, Incorporated, Defendant/Respondent  
Docket No.: 2005-358-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R, enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s Application for Admission *Pro Hac Vice* of Andrew D. Shore in the above-referenced matter with the requested filing fee of \$250.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Patrick W. Turner

PWT/nml  
Enclosures  
DM5 # 663873

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re:

dPi Teleconnect, LLC,

Complainant/Petitioner

v.

BellSouth Telecommunications, Inc.

Defendant/Respondent

Docket No. 2005-358-C

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**S.C. SUPREME COURT**

Comes now Andrew D. Shore, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0765, Fax Number 404-614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named law firm to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since August 20 of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of North Carolina. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:

Date Admitted:

North Carolina State Bar

08/20/1993

5. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.

8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

9. Applicant has previously appeared *pro hac vice* in South Carolina in two proceedings since 2001.

10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

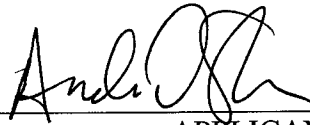
DATED this 16<sup>th</sup> day of January, 2007.

  
\_\_\_\_\_  
APPLICANT

VERIFICATION

STATE OF GEORGIA           )  
  )  
COUNTY OF FULTON        )

I, Andrew D. Shore, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.



APPLICANT/AFFIANT

Subscribed and sworn to before me this 16<sup>TH</sup> day of JANUARY, 2007



Notary Public for the State of GEORGIA

Brenda S. Slaughter

Notary Public, Rockdale County, Georgia

My Commission Expires July 29, 2010

My Commission Expires: \_\_\_\_\_

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S.C. SUPREME COURT



### LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 23<sup>rd</sup> day of January, 2007.

Patrick Turner

LOCAL COUNSEL OF RECORD

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JAN 23 2007

**S.C. SUPREME COURT**

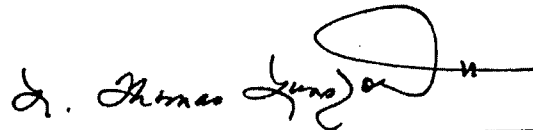


# The North Carolina State Bar

I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby certify that Andrew D. Shore (#20130) is an active member of the North Carolina State Bar in good standing as of this date, and was duly licensed to practice law in this state on August 20, 1993.

I further certify that as of this date the above named attorney has not been subject to any public disciplinary action by the North Carolina State Bar.

Given over my hand and the Seal of the North Carolina State Bar, this 8<sup>th</sup> day of January, 2007.



Secretary of the North Carolina State Bar

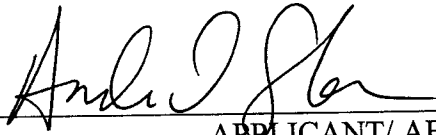
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JAN 23 2007

S.C. SUPREME COURT

## CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by **hand delivery** mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 23<sup>rd</sup> day of January, 2007.



APPLICANT/ AFFIANT

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JAN 23 2007

**S.C. SUPREME COURT**

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Andrew D. Shore in Docket No. 2005-358-C to be served upon the following on January 23, 2007.

Florence P. Belser, Esquire  
General Counsel  
Post Office Box 11263  
Columbia, South Carolina 29211  
(Office of Regulatory Staff)  
**(U. S. Mail and Electronic Mail)**

Nanette S. Edwards, Esquire  
Attorney  
Post Office Box 11263  
Columbia, South Carolina 29211  
(Office of Regulatory Staff)  
**(U. S. Mail and Electronic Mail)**

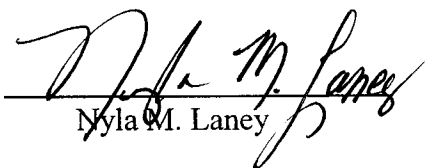
Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

F. David Butler, Esquire  
Senior Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

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COMMISSION

Joseph Melchers  
Chief Counsel  
S.C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
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Christopher Malish, Esquire  
Foster Malish Blair & Cowan, LLP  
1403 West Sixth Street  
Austin, Texas 78703  
(dPi Teleconnect, LLC)  
**(U. S. Mail and Electronic Mail)**



Nyla M. Laney

DM5 # 610276